

**From:** [Ray Roccon](#)  
**To:** (b) (6), (b) (7)  
**Subject:** RE: DirkThomas investigation  
**Date:** Monday, October 29, 2018 10:58:33 AM  
**Attachments:** [ATT00001.txt](#)

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(b) (6),  
(b) (7)

I left a message on your mobile voicemail a few minutes ago just to follow up on your progress. Hopefully the information that you received from me was detailed enough for you to quickly check things out to confirm that DirkThomas solutions has been using a pesticide product for a use inconsistent with its EPA labelling.

If you would please give me a call when you have an opportunity I would welcome some feedback on your efforts thus far.

Thank you,  
Ray

Raymond J Roccon  
In-situ Treatment Technologies, LLC  
194 Shingle Hollow Road  
Harmony, PA 16037  
724-581-8129

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**From:** (b) (6), (b) (7)(C)  
**Sent:** Friday, October 5, 2018 1:51 PM  
**To:** Ray Roccon <rjrocccon@icloud.com>  
**Subject:** RE: DirkThomas investigation

Thanks Ray,

Sorry I missed your call. I received everything. I'll get back in touch when I find out more.

Thanks,

(b) (6),  
(b) (7)

(b) (6), (b) (7)(C) | Special Agent  
U.S. Environmental Protection Agency  
1650 Arch Street, 3CE00

Philadelphia, PA 19103

(b) (6), (b) (7)(C)

Desk: (b) (6), (b) (7)

Cell: (b) (6), (b) (7)

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**From:** Ray Roccon [<mailto:rjrocccon@icloud.com>]

**Sent:** Thursday, October 4, 2018 4:31 PM

**To:** (b) (6), (b) (7)(C)

**Subject:** FW: DirkThomas investigation

Here is second email with your correct address.

Ray

Raymond J Roccon  
In-situ Treatment Technologies, LLC  
194 Shingle Hollow Road  
Harmony, PA 16037  
724-581-8129

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**From:** Ray Roccon <[rjrocccon@icloud.com](mailto:rjrocccon@icloud.com)>

**Sent:** Thursday, October 4, 2018 4:27 PM

**To:** (b) (6), (b) (7)(C)

**Subject:** FW: DirkThomas investigation

(b) (6),

Here is the email I referred to earlier. (b) (6) reply was basically – mind your own business or it might take me longer to get to it.

As I said, I would be happy to answer any additional questions you might have. Feel free to contact me.

I look forward to hearing back from you.

Best regards,  
Ray

Raymond J Roccon  
In-situ Treatment Technologies, LLC  
194 Shingle Hollow Road  
Harmony, PA 16037

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**From:** Ray Roccon <[rjrocccon@icloud.com](mailto:rjrocccon@icloud.com)>  
**Sent:** Thursday, September 6, 2018 3:50 PM  
**To:** (b) (6), (b) (7)(C)  
**Subject:** DirkThomas investigation

(b) (6), (b) (7)(C)

I know that you said that you had bigger fish to fry than my request to quickly investigate a case of 'Use of an unregistered pesticide by DirkThomas Solutions" , so I thought I might do some of the legwork for you to help out. My concern is that I have been sued by DirkThomas Solutions for contacting the EPA and the PA Dept of Agriculture and I have a limited amount of time in which to reply.

First off, please find just below the contact info for the 2 owners of DirkThomas solutions (DTS), (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) & (b) (6), (b) (7)(C) and (b) (6), (b) (7)(C) (VP of technology), and the field representative for PA dept of Ag, (b) (6), (b) (7)(C) .



I am also including some email traffic between me and (b) (6), (b) (7)(C) and also with her boss, (b) (6), (b) (7)(C) , both of PA Dept of Ag. This first one is from me to (b) (6), (b) (7)(C) regarding my message to (b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

When searching today for the address of DirkThomas Solutions, I found that I actually had your email address. Consequently, what follows is an email that I sent to (b) (6), (b) (7) regarding DirkThomas Solutions that I wanted to send to you.

I got a note back from (b) (6), (b) (7) saying that he would be out of the office until 6/18.

Any updates from your side?  
Thanks again for all your help.

Ray Roccon

-----Original Message-----

From: Ray Roccon <[rjrocccon@icloud.com](mailto:rjrocccon@icloud.com)>

Sent: Wednesday, June 13, 2018 12:07 PM

To: (b) (6), (b) (7)

Cc: [rjrocccon@centurylink.net](mailto:rjrocccon@centurylink.net)

Subject: Univar EPA Reg No 550-198

(b) (6), (b) (7)

I have been working with (b) (6), (b) (7) with regard to a complaint I made to the EPA regional office that found its way to PA Dept of Ag.

(b) (6), (b) (7) has been very helpful even though it has been very difficult getting a call back from the parties involved. I don't have her email, but she said she would be talking to you, and since we have had contact in the past with regard to my EPA registered product - In-situCide Promoter, EPA reg.no. 91146-1, I thought to send you this email.

My complaint to EPA was that DirkThomas Solutions has been servicing EQT by adding a biocide to disinfect the frac water being used in hydraulic fracturing operations that is not registered for that end use. (b) (6), (b) (7) was able to confirm that DTS is using a Univar product, Liquichlor 12.5% Solution. My understanding is that this has been happening for the past year or two but I could not confirm it until (b) (6), (b) (7) got the info on what they were using from the owner of DirkThomas solutions.

Reading the product label of 550-198, I can find no oilfield end use claim on the label. Consequently it should be against federal law to use this product to disinfect frac water on a well pad.

I also have a patented process to do what DTS is claiming to do, but this is a different and separate matter that I will pursue thru legal means.

Bottom line is that I believe DirkThomas solutions has, in effect, been using an unregistered pesticide in the past, and if you agree with my assessment, I would like this to stop - immediately if possible.

Thank you for any help you can lend in this matter. Please also pass my sincere thanks to (b) (6), (b) (7). I know that she has a lot of other issues on her plate and I greatly appreciate her tolerating my repeated follow up calls to her.

Best regards,  
Raymond Roccon  
724-581-8129  
[Rjrocccon@icloud.com](mailto:Rjrocccon@icloud.com)

(b) (6), [REDACTED] then replied:

I concur that use of this product in frac-water is a use inconsistent with the labeling.

(b) (6), (b) [REDACTED] | PESTICIDE REGISTRATION  
Pennsylvania Department of Agriculture  
Bureau of Plant Industry | Health & Safety Section  
2301 North Cameron Street | Harrisburg, PA 17110  
(b) (6), (b) (7)(C) [REDACTED]

Secondly, I used a website called [www.fracfocus.org](http://www.fracfocus.org) to look up the frac sites where DirkThomas used their Sodium Hypochlorite as the biocide for particular wells in Washington County, PA. I have attached the results from 15 separate wells in Washington County ONLY. This should show you that DirkThomas Solutions indeed used this hypo product as the biocide to disinfect waters used for hydraulic fracturing.

Lastly I have attached the EPA label for Univar Liquichlor 12.5% solution (EPA Reg No 550-198) so that you can verify that this product has NO oilfield or frac-ing claims on the label.

(b) [REDACTED]  
I realize how busy you are and that you have much more pressing priorities than mine. However, please realize that I am under significant pressure to get a judgement on this from you before my deadline for filing a counterclaim to DTS's complaint, 30 days from now. Consequently I would greatly appreciate you spending a very short period of time verifying the complaints that I have made against DTS. Hopefully the documentation I have provided, together with a short call to both (b) [REDACTED] and/or (b) [REDACTED], will confirm what I have alleged, namely that DTS has knowingly utilized what is in effect, an unregistered pesticide over the past few years to treat waters used in hydraulic fracturing operations.

Thank you very much for your assistance in this matter.

Best regards,  
Ray Roccon

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In-situ Treatment Technologies, LLC

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